

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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JONATHAN HARRIS,

Plaintiff,

-against-

CITY OF NEW YORK; Detective BRIAN
TAYLOR, Shield No. 4438; Police Officer NEIL
MAGLIANO, Shield No. 2766; Police Officer
SEAN NOCE, Shield No. 31328; Detective
JUSTIN PARRIS, Shield No. 22965; Sergeant
WESLEY FRADERA, Shield No. 4246,

Defendants.
-----X

PLAINTIFF'S PROPOSED
VERDICT SHEET

15 CV 8456 (CM)

Plaintiff Jonathan Harris respectfully submits the following Proposed
Verdict Sheet.

Dated: August 30, 2017
New York, New York

HARVIS & FETT LLP

/s/

Gabriel P. Harvis
305 Broadway, 14th Floor
New York, New York 10007
(212) 323-6880
gharvis@civilrights.nyc

Attorneys for plaintiff

Liability

1. Do you find in favor of plaintiff on his unlawful stop and search claim as to any of the defendants?

Detective Brian Taylor	<input type="checkbox"/> YES	<input type="checkbox"/> NO
Detective Neil Magliano	<input type="checkbox"/> YES	<input type="checkbox"/> NO
Detective Sean Noce	<input type="checkbox"/> YES	<input type="checkbox"/> NO
Detective Justin Parris	<input type="checkbox"/> YES	<input type="checkbox"/> NO
Sergeant Wesley Fradera	<input type="checkbox"/> YES	<input type="checkbox"/> NO

2. Do you find in favor of plaintiff on his false arrest claim as to any of the defendants?

Detective Brian Taylor	<input type="checkbox"/> YES	<input type="checkbox"/> NO
Detective Neil Magliano	<input type="checkbox"/> YES	<input type="checkbox"/> NO
Detective Sean Noce	<input type="checkbox"/> YES	<input type="checkbox"/> NO
Detective Justin Parris	<input type="checkbox"/> YES	<input type="checkbox"/> NO
Sergeant Wesley Fradera	<input type="checkbox"/> YES	<input type="checkbox"/> NO

3. Do you find in favor of plaintiff on his evidence fabrication claim as to any of these two defendants?

Detective Brian Taylor	<input type="checkbox"/> YES	<input type="checkbox"/> NO
Detective Neil Magliano	<input type="checkbox"/> YES	<input type="checkbox"/> NO

4. Do you find in favor of plaintiff on his failure to intervene claim as to any of the defendants?

Detective Brian Taylor	<input type="checkbox"/> YES	<input type="checkbox"/> NO
Detective Neil Magliano	<input type="checkbox"/> YES	<input type="checkbox"/> NO
Detective Sean Noce	<input type="checkbox"/> YES	<input type="checkbox"/> NO
Detective Justin Parris	<input type="checkbox"/> YES	<input type="checkbox"/> NO
Sergeant Wesley Fradera	<input type="checkbox"/> YES	<input type="checkbox"/> NO

5. Do you find in favor of plaintiff on his supervisory liability claim against Sergeant Wesley Fradera?

____ YES ____ NO

6. If you answered “Yes” to any of questions 1, 2, 3, 4 or 5 as to any defendant, do you find that the violation of plaintiff’s rights was the result of the policies, practices or customs of the City of New York, including the failure to train its officers?

____ YES ____ NO

If you answered “Yes” to any of Question 1, 2, 3, 4, or 5 as to any defendant, proceed to the next section. If you answered “No” to Questions 1, 2, 3, 4, 5 and 6, stop – you have reached your verdict. Please have the foreperson date and sign the verdict sheet and tell the Court Security Officer you have reached a verdict.

Damages

1. What amount of compensatory damages do you award to Mr. Harris against Detective Brian Taylor?

\$ _____

2. What amount of compensatory damages do you award to Mr. Harris against Detective Neil Magliano?

\$ _____

3. What amount of compensatory damages do you award to Mr. Harris against Detective Sean Noce?

\$ _____

4. What amount of compensatory damages do you award to Mr. Harris against Detective Justin Parris?

\$ _____

5. What amount of compensatory damages do you award to Mr. Harris against Sergeant Wesley Fradera?

\$ _____

6. Do you find that punitive damages are warranted against any of the defendants?

Detective Brian Taylor ____ YES ____ NO

If YES, state the amount \$ _____

Detective Neil Magliano ____ YES ____ NO

If YES, state the amount \$ _____

Detective Sean Noce ____ YES ____ NO

If YES, state the amount \$ _____

Detective Justin Parris ____ YES ____ NO

If YES, state the amount \$ _____

Sergeant Wesley Fradera ____ YES ____ NO

If YES, state the amount \$ _____

7. What amount of compensatory damages do you award to Mr. Harris against the City of New York?

\$ _____

Please have the foreperson date and sign the verdict sheet and tell the Court Security Officer you have reached a verdict.

SO SAY WE ALL.

FOREPERSON

_____, 2017
New York, New York